

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

In re:
KRISJENN RANCH, LLC
Debtor

§§§§

Chapter 11

Case No. 20-50805

**KRISJENN RANCH, LLC and
KRISJENN RANCH, LLC-SERIES
UVALDE RANCH, and KRISJENN
RANCH, LLC-SERIES PIPELINE
ROW as successors in interest to
BLACKDUCK PROPERTIES, LLC,
*Plaintiffs***



















V.

**DMA PROPERTIES, INC., and
LONGBRANCH ENERGY, LP,
*Defendants***

§§§

Adversary No. 20-05027

DMA PROPERTIES, INC
Cross-Plaintiff/Third Party Plaintiff

§

V.

**KRISJENN RANCH, LLC,
KRISJENN RANCH, LLC-SERIES
UVALDE RANCH, and KRISJENN
RANCH, LLC-SERIES PIPELINE ROW,
BLACK DUCK PROPERTIES, LLC,
LARRY WRIGHT, and JOHN TERRILL
*Cross-Defendants/Third-Party
Defendants***

Adversary No. 20-05027

**MOTION REQUESTING EXPEDITED CONSIDERATION KRISJENN RANCH, LLC,
KRISJENN RANCH, LLC-SERIES UVALDE RANCH, KRISJENN RANCH, LLC-
SERIES PIPELINE ROW, AS SUCCESSORS IN INTEREST TO BLACK DUCK
PROPERTIES, LLC'S MOTION TO CONTINUE DMA PROPERTIES, INC.'S MOTION**

**FOR PARTIAL SUMMARY JUDGMENT ON DMA'S OWNERSHIP INTEREST IN
THE BIGFOOT NOTE PAYMENT**

**DEBTOR HAS REQUESTED EXPEDITED CONSIDERATION OF THIS MOTION AND
HAS REQUESTED THAT A HEARING BE HELD ON THIS MOTION AT THE
COURT'S EARLIEST CONVENIENCE. IF THE COURT IN FACT SETS THIS
MOTION FOR AN EXPEDITED HEARING, THEN ONLY ATTENDANCE AT THE
HEARING IS NECESSARY TO PRESERVE YOUR RIGHTS**

TO THE HONORABLE CHIEF BANKRUPTCY JUDGE RONALD B. KING:

Debtors, Plaintiffs, and Counter-Defendants KrisJenn Ranch, LLC, KrisJenn Ranch, LLC-Series Uvalde Ranch, and KrisJenn Ranch, LLC-Series Pipeline Row, as successors in interest to Black Duck Properties, LLC (collectively the "Debtors"), files this Request for Expedited Consideration of Debtors' Motion to Continue DMA Properties, Inc.'s Motion for Partial Summary Judgment on DMA's Ownership Interest in the Bigfoot Note Payment (the "Motion"), and in support thereof respectfully shows the Court as follows:

I. BACKGROUND

1. On August 20, 2020 Debtors filed Debtors' Motion to Continue DMA Properties, Inc.'s Motion for Partial Summary Judgment on DMA's Ownership Interest in the Bigfoot Note Payments. (Dkt. 48).
2. DMA Properties, Inc. ("DMA") filed its Motion for Partial Summary Judgment on DMA's Ownership Interest in the Bigfoot Note Payments on August 14, 2020 and, unless extended, the Debtors' response is due on September 4, 2020 and the hearing on the Motion is set for Sept. 22, 2020.
3. Debtor requests an extension to respond until October 14, 2020, and an extension for the hearing in late October.

II. RELIEF REQUESTED

4. Debtors request expedited consideration of their Motion to Continue DMA Properties, Inc.'s Motion for Partial Summary Judgment on DMA's Ownership Interest in the Bigfoot Note Payments.

WHEREFORE, premises considered, Debtors respectfully request that the Court grant this request and set the Motion to be heard at the Court's earliest convenience.

Dated: August 20, 2020

Respectfully submitted,

MULLER SMEBERG, PLLC

By: /s/ John Muller

C. John Muller IV

State Bar No. 24070306

john@muller-smeberg.com

Ronald J. Smeberg

State Bar No. 24033967

ron@smeberg.com

Ezekiel John Perez

State Bar No. 24096782

zeke@muller-smeberg.com

111 W. Sunset Rd.

San Antonio, Texas 78209

Telephone: (210) 664-5000

Facsimile: (210) 598-7357

ATTORNEY FOR DEBTORS

CERTIFICATE OF CONFERENCE

I hereby certify that I conferenced with the opposing counsel, and they are opposed to this motion.

/s/ John Muller

John Muller

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on all counsel of record by way of e-service through the CM/ECF system by notice of electronic filing or via email on the 20th day of August 2020:

Michael Black
BURNS & BLACK PLLC
750 Rittiman Road
San Antonio, Texas 78209
210-829-2022
210-829-2021 fax
mblack@burnsandblack.com
Attorneys for Longbranch Energy, LP and
DMA Properties, Inc.

Christopher S. Johns
Christen Mason Hebert
JOHNS & COUNSEL PLLC
14101 Highway 290 West, Suite 400A
Austin, Texas 78737
512-399-3150
512-572-8005 fax
cjohns@johnsandcounsel.com
chebert@johnsandcounsel.com

Timothy Cleveland
CLEVELAND | TERRAZAS PLLC
4611 Bee Cave Road, Suite 306B
Austin, Texas 78746
512-689-8698
tcleveland@clevelandterrazas.com

Natalie Wilson
LANGLEY & BANACK, INC.
745 East Mulberry Avenue | Suite 700
San Antonio, TX 78212
210-736-6600
lwilson@langleybanack.com
Attorneys for DMA Properties, Inc.

Jeffery Duke
DUKE BANISTER MILLER & MILLER
22310 Grand Corner Drive, Suite 110
Katy, Texas 77494
jduke@dbmmlaw.com
Counsel for Longbranch Energy, LP

David P. Strolle, Jr.
Granstaff, Gaedke & Edgmon, P.C.
5535 Fredericksburg Road, Suite 110
San Antonio, Texas 78229
T- (210) 348-6600 ext. 203
F- (210) 366-0892
dstrolle@caglaw.net

OFFICE OF THE UNITED STATES
TRUSTEE
903 San Jacinto Blvd, Room 230
Austin, Texas 78701
shane.p.tobin@usdoj.gov
United States Trustee

/s/ John Muller

C. John Muller IV